

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, <i>Co-Chair</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> HANLY CONROY BIERSTEIN SHERIDAN FISHER & HAYES LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA ECF AND FACSIMILE**

January 21, 2016

The Honorable Frank Maas  
United States District Court for the  
Southern District of New York  
Daniel Patrick Moynihan United States  
Courthouse  
500 Pearl Street, Room 740  
New York, NY 10007-1312

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

The Plaintiffs' Executive Committees write to respectfully request that the existing deadline for submission of plaintiffs' motion to compel as to defendant Dallah Avco be extended two weeks from January 22, 2016 to February 5, 2016. Counsel for the plaintiffs and the defendant recently conducted a meet-and-confer on January 15, 2016 to address various issues with respect to Dallah Avco's document production. As a result of those discussions, plaintiffs are seeking the additional time to consult with their translators and conduct a further review of the defendant's mostly Arabic documents in an effort to narrow the scope of issues to be raised in plaintiffs' motion. Plaintiffs have conferred with counsel for Dallah Avco and they consent to the extension.

Plaintiffs thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,



J. Scott Tarbutton, Esq.

THE MDL 1570 PLAINTIFFS' EXECUTIVE  
COMMITTEES

The Honorable Frank Maas

January 21, 2016

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cc: MDL Counsel of Record (via ECF)

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